

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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03-MDL-1570 (GBD)(SN)

In Re:

TERROR ATTACKS ON
SEPTEMBER 11, 2001

**IRAN NOTICE
OF AMENDMENT**

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This document relates to:

Ashton, et al. v. al Qaeda Islamic Army, et al., Case No. 02-cv-6977 (GBD)(SN)
Bauer, et al. v. al Qaeda Islamic Army, et al., Case No. 02-cv-7236 (GBD)(SN)

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☒ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☐ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	New Plaintiff's Name (alphabetical by last name)	New Plaintiff's State of Residency at Filing (or death)	New Plaintiff's Citizenship/ Nationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
1	Beatini, Susan	New Jersey	U.S. Citizen	Paul F. Beatini	Wife	<i>Bauer</i> action ¹ Paragraph 46
2	Beatini, Thomas	New Jersey	U.S. Citizen	Paul F. Beatini	Brother	<i>Bauer</i> action Paragraph 46
3	Better, Margarita	Florida	U.S. Citizen	Milton Bustillo	Mother	<i>Bauer</i> action Paragraph 29
4	Bharvaney, Est. of Govind	Thailand	Thailand	Anil T. Bharvaney	Father	<i>Bauer</i> action Paragraph 27
5	Bharvaney, Kishore	Thailand	Thailand	Anil T. Bharvaney	Brother	<i>Bauer</i> action Paragraph 27
6	Bharvaney, Pandora	New Jersey	U.S. Citizen	Anil T. Bharvaney	Wife	<i>Bauer</i> action Paragraph 27
7	Bharvaney, Savitri	Thailand	Thailand	Anil T. Bharvaney	Mother	<i>Bauer</i> action Paragraph 27
8	Blest, Cynthia	New York	U.S. Citizen	Sean Rooney	Sister	<i>Bauer</i> action Paragraph 51
9	Bonnett, Cathynn	New York	U.S. Citizen	Colin Bonnett	Wife	<i>Bauer</i> action Paragraph 6
10	Bonnett, Heather	New York	U.S. Citizen	Colin Bonnett	Sister	<i>Bauer</i> action Paragraph 6
11	Bonnett, Julia	New York	U.S. Citizen	Colin Bonnett	Mother	<i>Bauer</i> action Paragraph 6
12	Bonnett, Kody	New York	U.S. Citizen	Colin Bonnett	Son	<i>Bauer</i> action Paragraph 6

¹ *Bauer, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-7236 (GBD)(SN), herein referred to as *Bauer* action, was consolidated into the *Ashton* action in the *Ashton* First Amended Consolidated Master Complaint filed on 08/01/2003, ECF No. 32.

13	Bonoli, Denise	Massachusetts	U.S. Citizen	Jack L. D'Ambrosi, Jr.	Sister	<i>Bauer</i> action Paragraph 21
14	Bowden, James F.	New Jersey	U.S. Citizen	Thomas H. Bowden, Jr.	Brother	<i>Bauer</i> action Paragraph 7
15	Bowden-Hart, Alyson V.	South Carolina	U.S. Citizen	Thomas H. Bowden, Jr.	Daughter	<i>Bauer</i> action Paragraph 7
16	Bowden-Hart, Deborah	South Carolina	U.S. Citizen	Thomas H. Bowden, Jr.	Wife	<i>Bauer</i> action Paragraph 7
17	Bowden-Hart, Sara J.	South Carolina	U.S. Citizen	Thomas H. Bowden, Jr.	Daughter	<i>Bauer</i> action Paragraph 7
18	Bowman, Carol A.	Florida	U.S. Citizen	Shawn E. Bowman, Jr.	Mother	<i>Bauer</i> action Paragraph 8
19	Bowman, James E.	New York	U.S. Citizen	Shawn E. Bowman, Jr.	Brother	<i>Bauer</i> action Paragraph 8
20	Bowman, Sr., Shawn E.	Florida	U.S. Citizen	Shawn E. Bowman, Jr.	Father	<i>Bauer</i> action Paragraph 8
21	Bowman Henry, Jack	New Jersey	U.S. Citizen	Shawn E. Bowman, Jr.	Son	<i>Bauer</i> action Paragraph 8
22	Bowman Henry, Liam	New Jersey	U.S. Citizen	Shawn E. Bowman, Jr.	Son	<i>Bauer</i> action Paragraph 8
23	Brandofino, Jeanne	New York	U.S. Citizen	Daniel L. Maher	Sister	<i>Bauer</i> action Paragraph 17
24	Brennan, Anita	Florida	U.S. Citizen	Thomas M. Brennan, Sr.	Mother	<i>Bauer</i> action Paragraph 45
25	Brennan, Catherine A.	New York	U.S. Citizen	Thomas M. Brennan, Sr.	Daughter	<i>Bauer</i> action Paragraph 45

Dated: December 2, 2021

Respectfully submitted,

BAUMEISTER & SAMUELS, P.C.

/s/ Dorothea M. Capone
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